

EXHIBIT C

James C. Pistorino (SBN 226496)

james@jdparrishlaw.com

Parrish Law Offices

224 Lexington Dr.

Menlo Park, CA 94025

Telephone: (650) 400-0043

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MR. GARY ZIEROTH as the representative of) Case No. 3:20-cv-00172-MMC

the estate of MRS. SHARON ZIEROTH.

Plaintiff

v.

DECLARATION IN SUPPORT OF MOTION
FOR ATTORNEYS' FEES UNDER THE
EQUAL ACCESS TO JUSTICE ACT

ALFEX AZAR, in his capacity as Secretary of the)

United States Department of Health and Human)

Services.

Defendant

I, Mr. Gary Zieroth, make this declaration on my own personal knowledge and, if called upon to do so, I could competently testify to the matters herein:

1. I am over the age of 18 and have never been convicted of a felony;

2. I am an attorney and the representative of the estate of my wife of more than 47 years.

Mrs. Sharon Zieroth:

3. Throughout the entirety of this litigation (or at any time during her life), Mrs. Zieroth

never had a net worth in excess of \$2,000,000 (including her community property

portion of any marital assets);

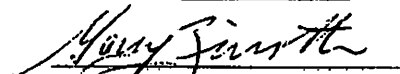
1 4. During her working life, Mrs. Zieroth was primarily employed as an executive
2 assistant until adopting our first child, after which she cared for our children:

3 5. As the executor of Mrs. Zieroth's estate and her husband, I was and am intimately
4 familiar with her financial condition, including investments, retirement savings, and
5 assets of any kind:
6

7 6. All of those assets (including her community property portion of any marital assets) -
8 minus any applicable debts - do not now and have never exceeded the net amount of
9 \$2,000,000.

10 I declare, under the penalty of perjury, that the foregoing is true and correct to the best of
11 my knowledge.

12 Executed this 5th day of October, 2020 in Central County, California

13
14 

15 Mr. Gary Zieroth

16 As the representative of the estate of
17 Mrs. Sharon Zieroth
18
19
20
21
22
23
24
25
26
27
28